

***Remarks***

Reconsideration of this Application is respectfully requested.

Claims 1, 4-17 and 88 are pending in the application, with claim 1 being the independent claim. Claims 2-3, 18-87 and 89-92 are cancelled without prejudice or disclaimer. Claims 1, 4, 9, 12, and 15-17 are sought to be amended to define the invention even more clearly. These changes are believed to introduce no new matter, and their entry is respectfully requested. Based on the above amendments and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

***Rejections under 35 U.S.C. § 102***

In the Office Action, claims 1, 5, 15, 17, 18, 21, 22, 26, 28, 30, 34, 44, 46-48, 50, 51, 55, 57, 59, 63, 73, 75-77, 79, 80, 84, 86, 88, 89, and 91 were rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by U.S. Patent No. 6,266,666 to Ireland et al. (hereinafter Ireland). Also, claims 2, 3, 9-13, 23-25, 27, 29, 31, 32, 38-42, 52-54, 56, 58, 60, 61, 67-71, 81-83, 85, 87, and 90 were rejected under 35 U.S.C. 103(a) as being allegedly unpatentable over Ireland in view of U.S. Patent No. 6,269,336 to Ladd et al. (“Ladd”). Applicants respectfully traverse these rejections and request that they be withdrawn.

Significant technical differences exist between the claimed invention and Ireland. Ireland does not teach each and every element of independent claim 1, as amended. For example, Ireland does not disclose or suggest, among other things, "at least one database that stores data relating to Internet Protocol (IP) telephony," "a plurality of service modules that provide at least an account management service and a call detail record

(CDR) service," and "a multi-database client that manages each service module's access to at least one database client", as recited in amended claim 1. Ireland also does not disclose "a database access manager that monitors each service module's access to the multi-database client", as recited in amended claim 1.

In rejecting claim 1, the Office Action equated the Java Transaction Service (JTS) and Jaguar CTS of Ireland to a service module and a multi-database client of the current application, respectively. According to Ireland, the Jaguar CTS is an exemplary embodiment of a component transaction server (CTS). See, e.g., Col. 6, lines 63-65. The CTS uses the JTS to coordinate transactions. See, e.g., Col. 7, lines 48-60; Fig. 2. The JTS of Ireland actually refers to a "Java enterprise service based on the Open Group Distributed Transaction Processing (D-TP) standard." Col. 7, lines 53-60. In this way, clients of Ireland are configured to access the back end database server using a transaction coordinator. *Id.* As such, the JTS is not used to access at least one database client, and the CTS is not configured to manage the JTS' access to the database client as in the claimed invention. Accordingly, Ireland fails to disclose at least "a multi-database client that manages each service module's access to at least one database client", as recited in amended claim 1.

In the rejection of claim 1, the session management module (SMM) of Ireland was equated with a database access manager of claim 1. According to Ireland, the SMM maintains a pool of communications sessions and allocates them to clients as needed. See, e.g., Col. 7, lines 37-41; and Fig. 2. Nowhere in Ireland is the SMM being described to monitor the JTS' access to the CTS. As previously discussed, the JTS does not actually access the CTS. Instead it is a form of standard used by the CTS' transaction

coordinator. See Col. 7, lines 54-60. Further, the SMM is used to allocate communication sessions to thin clients such as JAVA and Active X for accessing the database servers. See Fig. 2. As such, the SMM of Ireland is not used to monitor the JTS. Accordingly, Ireland fails to disclose "a database access manager that monitors each service module's access to the multi-database client", as recited in claim 1. Applicants therefore request that the Examiner reconsider and withdraw the rejection of claim 1.

The Examiner admits Ireland does not teach database services used in conjunction with a voice over the Internet communication system, but combines Ladd to arrive at the previously claimed invention. Applicants respectfully traverse. Applicants and submit no proper motivation to combine Ireland and Ladd is provided other than the impermissible benefit of hindsight based on Applicants' own invention. Further, even if Ireland and Ladd are combined, neither reference taken alone or in combination, teaches each and every elements of the present invention as now claimed. Ladd, in particular, fails to overcome the deficiencies noted above with respect to Ireland. Ladd does not teach or suggest each and every element of amended claim 1 including, among other things, "a multi-database client that manages each service module's access to at least one database client", and "a database access manager that monitors each service module's access to the multi-database client."

Dependent claims 4-12 and 88 are also patentable over Ireland and Ladd, taken alone or in combination, for at least these reasons, and further in view of their own respective features. Other references applied by the Examiner, including Donaldson, Pearson, and Montgomery in sections 3-5 of the Office Action, at the very least fail to

overcome the deficiencies of Ireland noted above. Applicants therefore request that the Examiner reconsider and withdraw the rejection of claims 4-17 and 88.

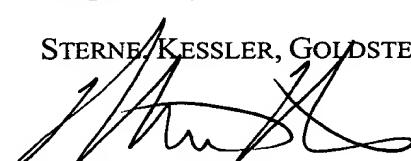
***Conclusion***

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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